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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

DAN DEFOREST, individually and on) Case No.
 behalf of all others similarly situated,)

Plaintiff,)

vs.)

PARADISE CRUISE LINE)
 OPERATOR LTD. INC. d/b/a)
 BAHAMA PARADISE CRUISE LINE)
 d/b/a ROYAL EMPRESS CRUISES;)
 CLASSICA CRUISE OPERATOR)
 LTD. INC. d/b/a BAHAMA)
 PARADISE CRUISE LINE d/b/a)
 ROYAL EMPRESS CRUISES;)
 BAHAMA PARADISE CRUISE LINE)
 d/b/a ROYAL EMPRESS CRUISES)
 and DOES 1 through 10, inclusive, and)
 each of them,)

Defendants.)

CLASS ACTION

**COMPLAINT FOR VIOLATIONS
 OF:**

1. NEGLIGENT VIOLATIONS OF
 THE TELEPHONE CONSUMER
 PROTECTION ACT [47 U.S.C.
 §227(b)]
2. WILLFUL VIOLATIONS OF THE
 TELEPHONE CONSUMER
 PROTECTION ACT [47 U.S.C.
 §227(b)]
3. NEGLIGENT VIOLATIONS OF
 THE TELEPHONE CONSUMER
 PROTECTION ACT [47 U.S.C.
 §227(c)]
4. WILLFUL VIOLATIONS OF THE
 TELEPHONE CONSUMER
 PROTECTION ACT [47 U.S.C.
 §227(c)]

DEMAND FOR JURY TRIAL

1 Plaintiff DAN DEFOREST (“Plaintiff”), individually and on behalf of all
2 others similarly situated, alleges the following upon information and belief based
3 upon personal knowledge:

4
5 **NATURE OF THE CASE**

6 1. Plaintiff brings this action individually and others similarly situated
7 seeking damages and any other available legal or equitable remedies resulting from
8 the illegal actions of PARADISE CRUISE LINE OPERATOR LTD. INC. d/b/a
9 BAHAMA PARADISE CRUISE LINE d/b/a ROYAL EMPRESS CRUISES,
10 CLASSICA CRUISE OPERATOR LTD. INC. d/b/a BAHAMA PARADISE
11 CRUISE LINE d/b/a ROYAL EMPRESS CRUISES, and BAHAMA PARADISE
12 CRUISE LINE d/b/a ROYAL EMPRESS CRUISES (“Defendants”), in
13 negligently, knowingly, and/or willfully contacting Plaintiff on Plaintiff’s cellular
14 telephone in violation of the Telephone Consumer Protection Act, 47. U.S.C. § 227
15 *et seq.* (“TCPA”), thereby invading Plaintiff’s privacy.

16 **JURISDICTION & VENUE**

17 2. Jurisdiction is proper under 28 U.S.C. § 1332(d)(2) because Plaintiff,
18 a resident of California, seeks relief on behalf of a Class, which will result in at
19 least one class member belonging to a different state than that of Defendants,
20 residents of Florida. Plaintiff also seeks up to \$1,500.00 in damages for each call
21 in violation of the TCPA, which, when aggregated among a proposed class in the
22 thousands, exceeds the \$5,000,000.00 threshold for federal court jurisdiction.
23 Therefore, both diversity jurisdiction and the damages threshold under the Class
24 Action Fairness Act of 2005 (“CAFA”) are present, and this Court has jurisdiction.

25 3. Venue is proper in the United States District Court for the Central
26 District of California pursuant to 18 U.S.C. 1391(b) and 18 U.S.C. § 1441(a)
27 because Defendants do business within the state of California and the Central
28 District of California.

PARTIES

4. Plaintiff, DAN DEFOREST (“Plaintiff”), is a natural person residing in Costa Mesa, California and is a “person” as defined by 47 U.S.C. § 153 (39).

5. Defendant, PARADISE CRUISE LINE OPERATOR LTD. INC. d/b/a BAHAMA PARADISE CRUISE LINE d/b/a ROYAL EMPRESS CRUISES (“Defendant PARADISE”), is a cruise line and is a “person” as defined by 47 U.S.C. § 153 (39).

6. Defendant, CLASSICA CRUISE OPERATOR LTD. INC. d/b/a BAHAMA PARADISE CRUISE LINE d/b/a ROYAL EMPRESS CRUISES (“Defendant CLASSICA”), is a cruise line and is a “person” as defined by 47 U.S.C. § 153 (39).

7. Defendant, BAHAMA PARADISE CRUISE LINE d/b/a ROYAL EMPRESS CRUISES (“Defendant BAHAMA”), is a cruise line and is a “person” as defined by 47 U.S.C. § 153 (39).

8. The above named Defendant, and its subsidiaries and agents, are collectively referred to as “Defendants.” The true names and capacities of the Defendants sued herein as DOE DEFENDANTS 1 through 10, inclusive, are currently unknown to Plaintiff, who therefore sues such Defendants by fictitious names. Each of the Defendants designated herein as a DOE is legally responsible for the unlawful acts alleged herein. Plaintiff will seek leave of Court to amend the Complaint to reflect the true names and capacities of the DOE Defendants when such identities become known.

9. Plaintiff are informed and believe that at all relevant times, each and every Defendant was acting as an agent and/or employee of each of the other Defendants and was acting within the course and scope of said agency and/or employment with the full knowledge and consent of each of the other Defendants. Plaintiff are informed and believe that each of the acts and/or omissions complained of herein was made known to, and ratified by, each of the other Defendants.

FACTUAL ALLEGATIONS

10. Beginning in or around July 2017, Defendants contacted Plaintiff on his cellular telephone, number ending in -7192, in an effort to sell or solicit its services.

11. Defendants used an “automatic telephone dialing system” as defined by 47 U.S.C. § 227(a)(1) to place its call to Plaintiff seeking to solicit its services.

12. Defendants contacted Plaintiff from telephone number (714) 362-4722 confirmed to be Defendants’ number.

13. During the call, Defendants provided Plaintiff with a website and information about the “Orlando Promotion” and a 70% off discount.

14. Defendants’ calls constituted calls that were not for emergency purposes as defined by 47 U.S.C. § 227(b)(1)(A).

15. Defendants’ calls were placed to telephone number assigned to a cellular telephone service for which Plaintiff incur a charge for incoming calls pursuant to 47 U.S.C. § 227(b)(1).

16. During all relevant times, Defendants did not possess Plaintiff’s “prior express consent” to receive calls using an automatic telephone dialing system or an artificial or prerecorded voice on his cellular telephone pursuant to 47 U.S.C. § 227(b)(1)(A).

17. Plaintiff is not a customer of Defendants’ services and has never provided any personal information, including his cellular telephone numbers, to Defendants for any purpose whatsoever. In addition, Plaintiff told Defendants at least once to stop contacting them and Plaintiff has been registered on the Do-Not-Call Registry for at least thirty (30) days prior to Defendants contacting him. Accordingly, Defendants never received Plaintiff “prior express consent” to receive calls using an automatic telephone dialing system or an artificial or prerecorded voice on their cellular telephone pursuant to 47 U.S.C. § 227(b)(1)(A).

18. Such calls constitute solicitation calls pursuant to 47 C.F.R. §

64.1200(c)(2) as they were attempts to promote or sell Defendants' services.

19. Plaintiff alleges upon information and belief, including without limitation his experiences as recounted herein, especially his experience of being called despite Defendants' lack of consent to call him, that Defendants lack reasonable policies and procedures to avoid the violations of the Telephone Consumer Protection act herein described.

CLASS ALLEGATIONS

20. Plaintiff brings this action individually and on behalf of all others similarly situated, as a member the four proposed classes (hereafter, jointly, "The Classes"). The class concerning the ATDS claim for no prior express consent (hereafter "The ATDS Class") is defined as follows:

All persons within the United States who received any solicitation/telemarketing telephone calls from Defendant to said person's cellular telephone made through the use of any automatic telephone dialing system or an artificial or prerecorded voice and such person had not previously consented to receiving such calls within the four years prior to the filing of this Complaint

21. The class concerning the ATDS claim for revocation of consent, to the extent prior consent existed (hereafter "The ATDS Revocation Class") is defined as follows:

All persons within the United States who received any solicitation/telemarketing telephone calls from Defendant to said person's cellular telephone made through the use of any automatic telephone dialing system or an artificial or prerecorded voice and such person had revoked any prior express consent to receive such calls prior to the calls within the four years prior to the filing of this Complaint.

1 22. The class concerning the National Do-Not-Call violation (hereafter
2 “The DNC Class”) is defined as follows:

3 All persons within the United States registered on the
4 National Do-Not-Call Registry for at least 30 days, who
5 had not granted Defendant prior express consent nor had
6 a prior established business relationship, who received
7 more than one call made by or on behalf of Defendant
8 that promoted Defendant’s products or services, within
any twelve-month period, within four years prior to the
filing of the complaint.

9 23. The class concerning the National Do-Not-Call violation following
10 revocation of consent and prior business relationship, to the extent they existed
11 (hereafter “The DNC Revocation Class”) is defined as follows:

12 All persons within the United States registered on the
13 National Do-Not-Call Registry for at least 30 days, who
14 received more than one call made by or on behalf of
15 Defendant that promoted Defendant’s products or
16 services, after having revoked consent and any prior
17 established business relationship, within any twelve-
18 month period, within four years prior to the filing of the
complaint.

19 24. Plaintiff represents, and is a member of, The ATDS Class, consisting
20 of all persons within the United States who received any solicitation telephone calls
21 from Defendants to said person’s cellular telephone made through the use of any
22 automatic telephone dialing system or an artificial or prerecorded voice and such
23 person had not previously not provided their cellular telephone number to
24 Defendants within the four years prior to the filing of this Complaint.

25 25. Plaintiff represents, and is a member of, The ATDS Revocation Class,
26 consisting of all persons within the United States who received any
27 solicitation/telemarketing telephone calls from Defendants to said person’s cellular
28 telephone made through the use of any automatic telephone dialing system or an

1 artificial or prerecorded voice and such person had revoked any prior express
2 consent to receive such calls prior to the calls within the four years prior to the
3 filing of this Complaint.

4 26. Plaintiff represents, and is a member of, The DNC Class, consisting
5 of all persons within the United States registered on the National Do-Not-Call
6 Registry for at least 30 days, who had not granted Defendants prior express consent
7 nor had a prior established business relationship, who received more than one call
8 made by or on behalf of Defendants that promoted Defendants' products or
9 services, within any twelve-month period, within four years prior to the filing of
10 the complaint.

11 27. Plaintiff represents, and is a member of, The DNC Revocation Class,
12 consisting of all persons within the United States registered on the National Do-
13 Not-Call Registry for at least 30 days, who received more than one call made by or
14 on behalf of Defendants that promoted Defendants' products or services, after
15 having revoked consent and any prior established business relationship, within any
16 twelve-month period, within four years prior to the filing of the complaint.

17 28. Defendants, their employees and agents are excluded from The
18 Classes. Plaintiff does not know the number of members in The Classes, but
19 believes the Classes members number in the thousands, if not more. Thus, this
20 matter should be certified as a Class Action to assist in the expeditious litigation of
21 the matter.

22 29. The Classes are so numerous that the individual joinder of all of its
23 members is impractical. While the exact number and identities of The Classes
24 members are unknown to Plaintiff at this time and can only be ascertained through
25 appropriate discovery, Plaintiff is informed and believes and thereon alleges that
26 The Classes includes thousands of members. Plaintiff alleges that The Classes
27 members may be ascertained by the records maintained by Defendant.

28 30. Plaintiff and members of The ATDS Class and The ATDS Revocation

1 Class were harmed by the acts of Defendants in at least the following ways:
2 Defendants illegally contacted Plaintiff and ATDS Class members via their cellular
3 telephones thereby causing Plaintiff and ATDS Class and ATDS Revocation Class
4 members to incur certain charges or reduced telephone time for which Plaintiff and
5 ATDS Class and ATDS Revocation Class members had previously paid by having
6 to retrieve or administer messages left by Defendant during those illegal calls, and
7 invading the privacy of said Plaintiff and ATDS Class and ATDS Revocation Class
8 members.

9 31. Common questions of fact and law exist as to all members of The
10 ATDS Class which predominate over any questions affecting only individual
11 members of The ATDS Class. These common legal and factual questions, which
12 do not vary between ATDS Class members, and which may be determined without
13 reference to the individual circumstances of any ATDS Class members, include,
14 but are not limited to, the following:

- 15 a. Whether, within the four years prior to the filing of this
16 Complaint, Defendants made any telemarketing/solicitation
17 call (other than a call made for emergency purposes or made
18 with the prior express consent of the called party) to a ATDS
19 Class member using any automatic telephone dialing system or
20 any artificial or prerecorded voice to any telephone number
21 assigned to a cellular telephone service;
- 22 b. Whether Plaintiff and the ATDS Class members were damaged
23 thereby, and the extent of damages for such violation; and
- 24 c. Whether Defendants and their agents should be enjoined from
25 engaging in such conduct in the future.

26 32. As a person that received numerous telemarketing/solicitation calls
27 from Defendants using an automatic telephone dialing system or an artificial or
28 prerecorded voice, without Plaintiff's prior express consent, Plaintiff is asserting

1 claims that are typical of The ATDS Class.

2 33. Common questions of fact and law exist as to all members of The
3 ATDS Revocation Class which predominate over any questions affecting only
4 individual members of The ATDS Revocation Class. These common legal and
5 factual questions, which do not vary between ATDS Revocation Class members,
6 and which may be determined without reference to the individual circumstances of
7 any ATDS Revocation Class members, include, but are not limited to, the
8 following:

- 9 a. Whether, within the four years prior to the filing of this
10 Complaint, Defendants made any telemarketing/solicitation
11 call (other than a call made for emergency purposes or made
12 with the prior express consent of the called party) to an ATDS
13 Revocation Class member, who had revoked any prior express
14 consent to be called using an ATDS, using any automatic
15 telephone dialing system or any artificial or prerecorded voice
16 to any telephone number assigned to a cellular telephone
17 service;
- 18 b. Whether Plaintiff and the ATDS Revocation Class members
19 were damaged thereby, and the extent of damages for such
20 violation; and
- 21 c. Whether Defendants and their agents should be enjoined from
22 engaging in such conduct in the future.

23 34. As a person that received numerous telemarketing/solicitation calls
24 from Defendants using an automatic telephone dialing system or an artificial or
25 prerecorded voice, after Plaintiff had revoked any prior express consent, Plaintiff
26 is asserting claims that are typical of The ATDS Revocation Class.

27 35. Plaintiff and members of The DNC Class and DNC Revocation Class
28 were harmed by the acts of Defendants in at least the following ways: Defendants

1 illegally contacted Plaintiff and DNC Class and DNC Revocation Class members
2 via their telephones for solicitation purposes, thereby invading the privacy of said
3 Plaintiff and the DNC Class and DNC Revocation Class members whose telephone
4 numbers were on the National Do-Not-Call Registry. Plaintiff and the DNC Class
5 and DNC Revocation Class members were damaged thereby.

6 36. Common questions of fact and law exist as to all members of The
7 DNC Class which predominate over any questions affecting only individual
8 members of The DNC Class. These common legal and factual questions, which do
9 not vary between DNC Class members, and which may be determined without
10 reference to the individual circumstances of any DNC Class members, include, but
11 are not limited to, the following:

- 12 a. Whether, within the four years prior to the filing of this
13 Complaint, Defendants or its agents placed more than one
14 solicitation call to the members of the DNC Class whose
15 telephone numbers were on the National Do-Not-Call Registry
16 and who had not granted prior express consent to Defendants
17 and did not have an established business relationship with
18 Defendants;
- 19 b. Whether Defendants obtained prior express written consent to
20 place solicitation calls to Plaintiff or the DNC Class members'
21 telephones;
- 22 c. Whether Plaintiff and the DNC Class member were damaged
23 thereby, and the extent of damages for such violation; and
- 24 d. Whether Defendants and their agents should be enjoined from
25 engaging in such conduct in the future.

26 37. As a person that received numerous solicitation calls from Defendants
27 within a 12-month period, who had not granted Defendants prior express consent
28 and did not have an established business relationship with Defendants, Plaintiff is

1 asserting claims that are typical of the DNC Class.

2 38. Common questions of fact and law exist as to all members of The
3 DNC Class which predominate over any questions affecting only individual
4 members of The DNC Revocation Class. These common legal and factual
5 questions, which do not vary between DNC Revocation Class members, and which
6 may be determined without reference to the individual circumstances of any DNC
7 Revocation Class members, include, but are not limited to, the following:

- 8 a. Whether, within the four years prior to the filing of this
9 Complaint, Defendants or its agents placed more than one
10 solicitation call to the members of the DNC Class whose
11 telephone numbers were on the National Do-Not-Call Registry
12 and who had revoked any prior express consent and any
13 established business relationship with Defendant;
14 b. Whether Plaintiff and the DNC Class member were damaged
15 thereby, and the extent of damages for such violation; and
16 c. Whether Defendants and their agents should be enjoined from
17 engaging in such conduct in the future.

18 39. As a person that received numerous solicitation calls from Defendants
19 within a 12-month period, who, to the extent one existed, had revoked any prior
20 express consent and any established business relationship with Defendants,
21 Plaintiff is asserting claims that are typical of the DNC Revocation Class.

22 40. Plaintiff will fairly and adequately protect the interests of the members
23 of The Classes. Plaintiff has retained attorneys experienced in the prosecution of
24 class actions.

25 41. A class action is superior to other available methods of fair and
26 efficient adjudication of this controversy, since individual litigation of the claims
27 of all Classes members is impracticable. Even if every Classes member could
28 afford individual litigation, the court system could not. It would be unduly

1 burdensome to the courts in which individual litigation of numerous issues would
 2 proceed. Individualized litigation would also present the potential for varying,
 3 inconsistent, or contradictory judgments and would magnify the delay and expense
 4 to all parties and to the court system resulting from multiple trials of the same
 5 complex factual issues. By contrast, the conduct of this action as a class action
 6 presents fewer management difficulties, conserves the resources of the parties and
 7 of the court system, and protects the rights of each Classes member.

8 42. The prosecution of separate actions by individual Classes members
 9 would create a risk of adjudications with respect to them that would, as a practical
 10 matter, be dispositive of the interests of the other Classes members not parties to
 11 such adjudications or that would substantially impair or impede the ability of such
 12 non-party Class members to protect their interests.

13 43. Defendants have acted or refused to act in respects generally
 14 applicable to The Classes, thereby making appropriate final and injunctive relief
 15 with regard to the members of the Classes as a whole.

16 **FIRST CAUSE OF ACTION**

17 **Negligent Violations of the Telephone Consumer Protection Act**

18 **47 U.S.C. §227(b).**

19 **On Behalf of the ATDS Class and ATDS Revocation Class**

20 44. Plaintiff repeats and incorporates by reference into this cause of action
 21 the allegations set forth above at Paragraphs 1-43.

22 45. The foregoing acts and omissions of Defendants constitute numerous
 23 and multiple negligent violations of the TCPA, including but not limited to each
 24 and every one of the above cited provisions of 47 U.S.C. § 227(b), and in particular
 25 47 U.S.C. § 227 (b)(1)(A).

26 46. As a result of Defendants' negligent violations of 47 U.S.C. § 227(b),
 27 Plaintiff and the Class Members are entitled an award of \$500.00 in statutory
 28 damages, for each and every violation, pursuant to 47 U.S.C. § 227(b)(3)(B).

1 47. Plaintiff and the ATDS Class and ATDS Revocation Class members
2 are also entitled to and seek injunctive relief prohibiting such conduct in the future.

3 **SECOND CAUSE OF ACTION**

4 **Knowing and/or Willful Violations of the Telephone Consumer Protection**
5 **Act**

6 **47 U.S.C. §227(b)**

7 **On Behalf of the ATDS Class and the ATDS Revocation Class**

8 48. Plaintiff repeats and incorporates by reference into this cause of action
9 the allegations set forth above at Paragraphs 1-43.

10 49. The foregoing acts and omissions of Defendants constitute numerous
11 and multiple knowing and/or willful violations of the TCPA, including but not
12 limited to each and every one of the above cited provisions of *47 U.S.C. § 227(b)*,
13 and in particular *47 U.S.C. § 227 (b)(1)(A)*.

14 50. As a result of Defendants' knowing and/or willful violations of *47*
15 *U.S.C. § 227(b)*, Plaintiff and the ATDS Class and ATDS Revocation Class
16 members are entitled an award of \$1,500.00 in statutory damages, for each and
17 every violation, pursuant to *47 U.S.C. § 227(b)(3)(B)* and *47 U.S.C. § 227(b)(3)(C)*.

18 51. Plaintiff and the Class members are also entitled to and seek injunctive
19 relief prohibiting such conduct in the future.

20 **THIRD CAUSE OF ACTION**

21 **Negligent Violations of the Telephone Consumer Protection Act**

22 **47 U.S.C. §227(c)**

23 **On Behalf of the DNC Class and the DNC Revocation Class**

24 52. Plaintiff repeats and incorporates by reference into this cause of action
25 the allegations set forth above at Paragraphs 1-43.

26 53. The foregoing acts and omissions of Defendants constitute numerous
27 and multiple negligent violations of the TCPA, including but not limited to each
28 and every one of the above cited provisions of *47 U.S.C. § 227(c)*, and in particular

1 47 U.S.C. § 227 (c)(5).

2 54. As a result of Defendants' negligent violations of 47 U.S.C. § 227(c),
3 Plaintiff and the DNC Class and DNC Revocation Class Members are entitled an
4 award of \$500.00 in statutory damages, for each and every violation, pursuant to
5 47 U.S.C. § 227(c)(5)(B).

6 55. Plaintiff and the DNC Class and DNC Revocation Class members are
7 also entitled to and seek injunctive relief prohibiting such conduct in the future.

8 **FOURTH CAUSE OF ACTION**

9 **Knowing and/or Willful Violations of the Telephone Consumer Protection**
10 **Act**

11 **47 U.S.C. §227 et seq.**

12 **On Behalf of the DNC Class and DNC Revocation Class**

13 56. Plaintiff repeats and incorporates by reference into this cause of action
14 the allegations set forth above at Paragraphs 1-43.

15 57. The foregoing acts and omissions of Defendants constitute numerous
16 and multiple knowing and/or willful violations of the TCPA, including but not
17 limited to each and every one of the above cited provisions of 47 U.S.C. § 227(c),
18 in particular 47 U.S.C. § 227 (c)(5).

19 58. As a result of Defendants' knowing and/or willful violations of 47
20 U.S.C. § 227(c), Plaintiff and the DNC Class and DNC Revocation Class members
21 are entitled an award of \$1,500.00 in statutory damages, for each and every
22 violation, pursuant to 47 U.S.C. § 227(c)(5).

23 59. Plaintiff and the DNC Class and DNC Revocation Class members are
24 also entitled to and seek injunctive relief prohibiting such conduct in the future.

25 **PRAYER FOR RELIEF**

26 WHEREFORE, Plaintiff requests judgment against Defendants for the following:

27 ///

28 ///

FIRST CAUSE OF ACTION

Negligent Violations of the Telephone Consumer Protection Act

47 U.S.C. §227(b)

- As a result of Defendants' negligent violations of 47 U.S.C. §227(b)(1), Plaintiff and the ATDS Class and ATDS Revocation Class members are entitled to and request \$500 in statutory damages, for each and every violation, pursuant to 47 U.S.C. 227(b)(3)(B).
- Any and all other relief that the Court deems just and proper.

SECOND CAUSE OF ACTION

Knowing and/or Willful Violations of the Telephone Consumer Protection Act

47 U.S.C. §227(b)

- As a result of Defendants' willful and/or knowing violations of 47 U.S.C. §227(b)(1), Plaintiff and the ATDS Class and ATDS Revocation Class members are entitled to and request treble damages, as provided by statute, up to \$1,500, for each and every violation, pursuant to 47 U.S.C. §227(b)(3)(B) and 47 U.S.C. §227(b)(3)(C).
- Any and all other relief that the Court deems just and proper.

THIRD CAUSE OF ACTION

Negligent Violations of the Telephone Consumer Protection Act

47 U.S.C. §227(c)

- As a result of Defendants' negligent violations of 47 U.S.C. §227(c)(5), Plaintiff and the DNC Class and DNC Revocation Class members are entitled to and request \$500 in statutory damages, for each and every violation, pursuant to 47 U.S.C. 227(c)(5).
- Any and all other relief that the Court deems just and proper.

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FOURTH CAUSE OF ACTION

**Knowing and/or Willful Violations of the Telephone Consumer Protection
Act**

47 U.S.C. §227(c)

- As a result of Defendants' willful and/or knowing violations of 47 U.S.C. §227(c)(5), Plaintiff and the DNC Class and DNC Revocation Class members are entitled to and request treble damages, as provided by statute, up to \$1,500, for each and every violation, pursuant to 47 U.S.C. §227(c)(5).
- Any and all other relief that the Court deems just and proper.

JURY DEMAND

- Pursuant to the Seventh Amendment to the Constitution of the United States of America, Plaintiff is entitled to, and demands, a trial by jury.

Respectfully Submitted this 13th day of August, 2018.

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

By: /s Todd M. Friedman
Todd M. Friedman
Law Offices of Todd M. Friedman
Attorney for Plaintiff